

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

IN RE: JOSE L. DELGADO PACHECO DEBTOR(S)	CASE NUMBER: 10-02294-SEK CHAPTER 13 ASSET CASE)
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DEBTORS REPLY TO TRUSTEE'S MOTION TO DISMISS

TO THE HONORABLE COURT:

COMES now Debtor(s) represented by the undersigned counsel and respectfully Allege(s) and Pray(s) as follows:

1. That on May 12, 2011, the Trustee filed a Motion to Dismiss based on the fact that debtor's was in arrears in the amount of \$1,638.32 dollars.
2. Debtors paid \$500.00 dollars and the outstanding balance in twenty (30) days. Enclosed please find evidence of payments.
3. Based on the abovementioned, it is debtor's contention that Trustee's motion turns into a moot one.

NOTICE

Within thirty (30) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for

JOSE L. DELGADO PACHECO
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REPLY TRUSTEE MOTION...

the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the objection will be deemed unopposed and may be granted unless: (1) the requested relief is forbidden by law; (2) the requested relief is against public policy; or (3) in the opinion of the court, the interest of justice requires otherwise. If you file a timely response, the court may - in its discretion - schedule a hearing.

WHEREFORE, it is respectfully requested from this Honorable Court to GRANT the present Motion, therefore deny Trustee's Motion to Dismiss.

In San Juan, Puerto Rico, this 8th, day of June 2011.

RESPECTFULLY SUBMITTED.

/s/ Marilyn Valdes Ortega
MARILYN VALDES ORTEGA

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I HEREBY CERTIFY: That I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following:

10-02294-SEK13 Notice will be electronically mailed to:

JOSE RAMON CARRION MORALES
newecfmail@ch13-pr.com

MONSITA LECAROS ARRIBAS
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MARILYN VALDES ORTEGA on behalf of Debtor
valdeslaw@prtc.net

I HEREBY CERTIFY: That I have mailed by regular mail to all creditors listed.

10-02294-SEK13 Notice will not be electronically mailed to:

AEE

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